

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 RYAN W. DANIELS
Nevada Bar No. 13094
3 KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
4 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
5 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
6 Fax: (702) 796-7181
landerson@kcnvlaw.com
7 rdaniels@kcnvlaw.com
kkalkowski@kcnvlaw.com

8 *Attorneys for Defendants,*
9 *Las Vegas Community Corrections Center*
10 *and Alisha Washington*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 MAURICE COOPER, individually,
14 Plaintiff,
15 vs.
16 ALISHA WASHINGTON, ET AL.
17 Defendants.

CASE NO.: 2:21-cv-01847-RFB-DJA

**LVCCC's MOTION FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT**

18 Defendant Las Vegas Community Corrections Center ("LVCCC"), by and through its
19 counsel, Kaempfer Crowell, move for an extension of time to respond to Plaintiff's Complaint.
20 LVCCC requests this Court give LVCCC until November 22, 2021 to answer the complaint,
21 matching the United States' response deadline. *See* ECF No. 5.

22 Like the United States, Plaintiff improperly served LVCCC with the summons and
23 complaint through the mail. *See* ECF No. 4 at ¶ 4. LVCCC needs time to meaningfully evaluate
24 the allegations of the complaint and prepare a response to that pleading. In addition, LVCCC

1 needs to answer on behalf of Alisha Washington because Plaintiff alleges she worked for
2 LVCCC during the relevant time. Since Alisha Washington has until November 22, 2021 to
3 respond (*see* ECF No. 5), allowing LVCCC the same amount of time will allow the parties to
4 coordinate their responses, promoting judicial efficiency and economy.

5 DATED this 12th day of October, 2021.

6 KAEMPFER CROWELL

7
8 By: /s/ Lyssa S. Anderson

9 LYSSA S. ANDERSON (Nevada Bar No. 5781)

10 RYAN W. DANIELS (Nevada Bar No. 13094)

11 KRISTOPHER J. KALKOWSKI (Nevada Bar No. 14892)

12 1980 Festival Plaza Drive, Suite 650

13 Las Vegas, Nevada 89135

14 *Attorneys for Defendants,*
15 *Las Vegas Community Corrections Center*
16 *and Alisha Washington*

17 **IT IS SO ORDERED:**

18 **DATE:** October 13, 2021

19 
20 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

I certify that I am an employee of KAEMPFER CROWELL, and that on the date below, I caused the foregoing **LVCCC's MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** to be served via CM/ECF and/or First Class Mail (where indicated) addressed to the following:

Maurice Donnell Cooper
1048 Hassell Avenue
Las Vegas, NV 89106

Pro Se Plaintiff

(Via U.S., First Class Mail)

Christopher Chiou, Acting United States Attorney
Skyler H. Pearson, Asst. United States Attorney
District of Nevada
501 Las Vegas Blvd., S., Suite 1100
Las Vegas, NV 89101
Ph: (702) 388-6336
E-Mail: Skyler.pearson@usdoj.gov

***Attorneys for Defendants,
United States Probation Office
and Chad R. Boardman***

DATED this 12th day of October, 2021.

/s/ Luisa Cota

an employee of Kaempfer Crowell